



May 3, 2017

Attn: Eric Schlaf
Staff, Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701
Via email: eschlaf@icc.state.il.us

RE: SoCore Comments on Staff's Draft Proposal on the Utility Scale Solar and Wind Certification

Dear Mr. Schlaf:

SoCore Energy ("SoCore") appreciates the opportunity to comment on Staff's April 20th Draft Rule on the Utility Scale Solar and Wind Certification. SoCore is solar development company headquartered in Chicago. We have approximately 70 Illinois-based employees and additional field staff located across the country. We have developed, constructed and interconnected more than 315 solar projects (C&I rooftop and small utility-scale ground-mount) in 22 different states and we expect to construct another 100+ MW in 2017. We are excited to see the Illinois utility-scale solar market poised for growth and we are ready to work with the ICC to ensure that projects are installed safely and efficiently.

(1) Concerning the definition of "Install"

We support the definition of "Install" proposed by staff in the Draft Rule and are not proposing any changes at this time. Staff's proposed definition is as follows:

"Install" means to perform the electrical wiring and connections necessary to interconnect the new solar or new wind project with the electric utility's distribution system at the point of interconnection between the project and the utility.

This proposed definition of "install," and the additional clarifications that follow, make it clear that the rule is intended to define the certification process for persons qualified to perform or directly supervise the *interconnection* of a new utility scale solar or wind system to the electric grid. Interconnection is a specific, one-time operation wherein a mechanically complete project is connected to the grid and energized. Interconnection is permitted and overseen by the utility after a final as-built project inspection has been conducted and the utility has issued an interconnection agreement.

SoCore Energy | 225 W Hubbard Street, Suite 200, Chicago, IL 60654 | (877) 762 6731

SoCore Energy is not the same company as Southern California Edison, the utility.
Additionally, SoCore Energy is not regulated by the California Public Utilities Commission.



(2) Concerning the definition of “Qualified Person”

The certification programs articulated in Staff’s proposed definition of “Qualified Person” are geared toward distributed generation and do not necessarily prepare trainees to perform the medium/high voltage interconnection required by a utility-scale system. We therefore recommend striking the list of training programs from the definition of “qualified person” and instead, rely on the rigorous electrical licensing requirements imposed by local permitting authorities.

~~“Qualified person” means a person who performs or directly supervises installations on behalf of the certificate holder. This person is the licensed electrician named on the construction or electrical permit from the authority having jurisdiction over the project, and who has completed at least one of the following programs requiring lab or field work and received a certification of satisfactory completion: an apprenticeship as a journeyman electrician from a DOL-registered electrical apprenticeship and training program; a North American Board of Certified Energy Practitioners (NABCEP) distributed generation technology certification program; an Underwriters Laboratories (UL) distributed generation technology certification program; an Electronics Technicians Association (ETA) distributed generation technology certification program; or an Associate in Applied Science degree from an Illinois Community College Board-approved community college program in the appropriate generation technology. To be considered a “qualified person”, the experience and/or training relied upon must be with the same type of generation technology for which the qualification status is sought.~~

Before any work can begin, any entity constructing a utility-scale wind or solar installation must first receive a construction and/or electrical permit from the local permitting authority, and you can’t pull a local permit without submitting the electrical license of the master or journeyman electrician who will be responsible for performing or directly supervising the installation. The electrical licensing requirement is rigorous and ensures that the licensee has had adequate training and experience needed to perform or supervise the installation, maintain safety and reliability, and comply with the NEC and NESC (if applicable). Therefore, we believe that the local permitting regime contains adequate safeguards to satisfy the legislature’s intent in Section 16-128A of the Public Utilities Act [220 ILCS 5/16-128A] that “entities installing a new wind project or a new photovoltaic project have the requisite knowledge, skills, training, experience, and competence to perform in a safe and reliable manner.” With this assurance, the ICC’s



certification process can document compliance with existing licensing requirements without imposing redundant training requirements or red tape.

(3) Other considerations

At the April 26th workshop, there was discussion about which of the several business entities involved in a utility-scale solar or wind project should be responsible for obtaining the certification. For example, it is often the case that a project developer like SoCore will contract with a general contractor who may self-perform the electrical work or contract with an electrical sub. We recommend that the certification be held by the business entity that employs the qualified person who holds the applicable electrical license. The developer, general contractor, and electrical sub-contractor/s (if applicable) can address this requirement contractually to ensure that the certification is obtained.

(4) Conclusion

We appreciate the opportunity to offer comments and are grateful for Staff's efforts to expedite this proceeding.

Respectfully,

Madeleine Klein
Managing Director of Policy & Market Strategy
SoCore Energy, LLC